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Attorneys for Defendants
NATIONAL RAILROAD PASSENGER
CORPORATION dba AMTRAK and JOE DEELY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOHN EARL CAMPBELL,

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER
CORPORATION dba AMTRAK, JOE DEELY,
and DOES 1-15, inclusive,

Defendants.

Case No. C05-05434 CW

**STIPULATION REGARDING
UNOPPOSED MOTIONS *IN LIMINE*
AND ORDER**

Pretrial Conf: January 13, 2009
Time: 2:00 p.m.
Courtroom: Ctrm 2, 4th Floor,
1301 Clay Street, Oakland
Judge: Hon. Claudia Wilken
Trial: February 9, 2009

1 Plaintiff John Earl Campbell and Defendant National Railroad Passenger Corporation
2 (“Amtrak”) hereby stipulate that the following motions *in limine* are unopposed and request that
3 the Court sign the proposed order below.

4 I. Plaintiff’s motions.

5 A. Motion in Limine to exclude evidence of Plaintiff’s prior workers compensation
6 lawsuit and settlement in 1992.

7 B. Motion in Limine to exclude reference to Plaintiff’s counsel’s prior and current
8 representation in cases against Defendant Amtrak, Joe Deely, and Steve Shelton.

9 C. Motion in Limine to exclude any discussion of when Plaintiff sought legal counsel
10 and filed this lawsuit.

11 D. Motion in Limine to exclude evidence of Plaintiff’s use of his savings and
12 insurance payments after his termination from Amtrak.

13 II. Defendant’s motions.

14 A. Motion in Limine to exclude any evidence on the subject of the *Morgan v. Amtrak*
15 or *Howard v. Amtrak* actions previously tried in the Northern District of California or the
16 *Campbell v. Amtrak* class action filed in the U. S. District Court for the District of Columbia, as
17 well as any other lawsuit, claim, charges, verdict, settlement, consent decree or legal judgment
18 against or involving Amtrak.

19 B. Motion in Limine to exclude evidence or mention of the expenses of litigation
20 and/or attorney’s fees incurred and mention of the size, locale, and nature of practice of any
21 party’s law firm in this case, as well as the number of attorneys who have worked on this case.

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1 C. Motion in Limine to exclude any witness who is not a designated party
2 representative from attending or observing any aspect of the trial prior to their testimony.

3 Respectfully submitted,

4 Date: January 6, 2009

JACKSON LEWIS LLP

5 By: s/Dylan B. Carp

6 Patrick C. Mullin

7 Dylan B. Carp

8 Attorneys for Defendant

NATIONAL RAILROAD PASSENGER

CORPORATION dba AMTRAK, and

9 JOE DEELY

10 Date: January 6, 2009

PRICE AND ASSOCIATES

11 By: s/Pamela Y. Price

12 Pamela Y. Price

13 Attorney for Plaintiff

14 JOHN EARL CAMPBELL

15 **ORDER**

16 The Court, having reviewed the above Stipulation, GRANTS the unopposed Motions *In*
17 *Limine* listed above.

18 It is so ordered.

19 Dated: January _13, 2009



20 Hon. Claudia Wilken

21 U.S. District Court Judge

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